

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JASON B. HAMILTON and : CHAPTER 13
CHRISTINE MARIE HAMILTON :
Debtors :
 :
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE :
Movant :
 :
vs. :
 :
JASON B. HAMILTON and :
CHRISTINE MARIE HAMILTON :
Respondents : CASE NO. 1-19-bk-03853

TRUSTEE'S OBJECTION TO SIXTH AMENDED CHAPTER 13 PLAN

AND NOW, this 9th day of September, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Debtor(s) have failed to file a Chapter 13 Means Test (Form 122C) as required. Plan does not pay amount required by the Means Test.
2. Trustee avers that debtor(s)' plan cannot be administered due to the lack of the following:
 - a. Last paystub dated August, 2022.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Douglas R. Roeder
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 9th day of September, 2022, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Dorothy Mott, Esquire
125 State Street
Harrisburg, PA 17101

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee